

Harvesting Alfalfa Seed Crops Under a SLN (24c) Registration

Purpose	To provide clarification regarding the different regulations and restrictions on harvesting of alfalfa seed crops under a special local need (SLN) section 24(c) registration.
Three authorities	Authorities that regulate alfalfa seed crops treated under an SLN registration: <ol style="list-style-type: none">1. The Federal Insecticide, Fungicide, and Rodenticide Act (FIFRA)2. Food and Agricultural Code (FAC)3. SLN Label
SLN and FIFRA	FIFRA states in section 24(c)(3) that an SLN may only be issued for crops <ul style="list-style-type: none">• With an established tolerance,• An exemption from tolerance, or• For non-food/non-feed sites.
FAC restrictions	Alfalfa when grown for seed production is classified as non-food and non-feed site per FAC section 12832 when the following conditions are met: <ol style="list-style-type: none">1. All seed screenings shall be disposed of in such a way that they cannot be distributed or used for food or feed. The seed conditioner shall keep records of screenings disposal for three years from the date of disposal.2. No portion of the seed plant may be used or distributed for food or feed.3. All seed crops grown on a non-food/non-feed site or conditioned in California must bear a tag or container label that forbids the use of the seed for human consumption or animal feed, and4. Seed grown on a non-food/non-feed site or conditioned in California may not be distributed for human consumption or animal feed.

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Monitor 4® restrictions

Label requirements found on the SLN for Monitor 4® Liquid Insecticide (SLN #CA-980013) for alfalfa grown for seed incorporate by reference requirements found in FAC section 12832. In addition, the SLN label prohibits seed from treated plants to be used for growing sprouts for human or animal consumption.

There is no tolerance for methamidophos (Monitor 4® active ingredient) on alfalfa. Since there is no tolerance, no part of the treated plant may enter the human or animal food chain.

No harvests from subsequent growing seasons

Since alfalfa seed is the only SLN labeled perennial crop, it creates a unique situation regarding harvesting subsequent crop production.

FAC section 12832 restrictions and SLN label requirements for Monitor 4® carry over from one growing season to the next until the plant is removed from the ground. The section 24(c) labeling does not provide an exemption for perennial crops.

Therefore, alfalfa treated with Monitor 4® or other 24(c) registered products where no tolerance has been established, cannot be harvested for food or feed in subsequent growing seasons.

One-year PHI requests

Interested parties may request a one-year pre-harvest interval (PHI) through the following steps:

- Provide required data to U.S. Environmental Protection Agency (EPA)
- Submit a 24(c) amendment request to the Department of Pesticide Regulation (DPR).

DPR will then submit the request to U.S. EPA
